



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE 5/19/14	TIME 1:00 PM	INSPECTION FILE NO. 3400074872	The Sawhorse Company
2. INSPECTOR'S ADDRESS U.S. Environmental Protection Agency Region 8 (8ENF-AT) 1595 Wynkoop Street Denver, Colorado 80202-1129			4. FACILITY ADDRESS 21 E Monument Ste A Colorado Springs, CO 80903

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

REASON FOR INSPECTION

☐ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures, or articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures, or articles within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

Kenton Pass

the SawHorse company

C-719.492.1342
O-719.520.1250
SawHorseCompany.com
kenton@SawHorseCompany.com
21 East Monument St. Suite A
Colorado Springs, CO 80903

INSPECTOR'S SIGNATURE James R Maley		RECIPIENT'S SIGNATURE Kenton Pass	
NAME Jim Maley		NAME Kenton Pass	
TITLE Compliance Inspector	DATE SIGNED 5/19/14	TITLE Owner	DATE SIGNED 5/19/14

**EPA Region 8 TSCA §402c Renovation, Repair, and Painting Rule
Inspection Checklist**

BASIC INSPECTION INFORMATION

Inspection
Date / Time:

Inspection no.

Regulated Entity

Type organization:	<input type="checkbox"/>	Contractor / renovator, G.C.	<input type="checkbox"/>	window replacement	<input type="checkbox"/>	special trades – plumbing, electrical, painting	<input type="checkbox"/>	landlord / property manager	<input type="checkbox"/>	child-occupied facility
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Firm name & legal status, address & contact information – phone, website, email #1

Owner name, address & contact information

#2

Representative name, title, address & contact information

#3

Inspection Site

Type building: ☐ single family residence ☐ multi-family residence ☐ child-occupied facility ☐ office/store ☐ other _____

“Extent” factors Child(ren) under 6 ☐ pregnant woman ☐ present

Inspection site information: owner name, address, year built

Reason for inspection: ☐ for cause (tip or complaint) ☐ selected monitoring ☐ neutral scheme

Inspection was: ☐ unannounced
☐ scheduled in advance by ☐ phone ☐ letter ☐ email ☐ in person On date:

Person(s) interviewed during inspection:

Name	title	organization	telephone number



EPA Region 8 TSCA §402c Renovation, Repair, and Painting Rule
Inspection Checklist
Inspector Notes

Owner removed most but not all of painted surfaces. Owner said she didn't have time to complete the demo when Sawhorse arrived. Heat turned off. Door to basement was covered with 6 mil plastic. Area cleaned daily. Gave owner "protect your family" Did not get receipt.

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Phase 1 – Firm and Individual Certification

Describe the firm and nature of its work: work done by employees or contractors, does their work done by employees or contractors or subcontractors disturb lead-based paint? number of employees, projects/year, area served?

Does firm work on residential buildings or child-occupied facilities built before 1978 ?

☐ Yes ☐ No

Do they check ages of buildings before work?

☐ Yes ☐ No

Is the firm an EPA- Certified Renovation Firm?

☐ Yes *get copy or photo of certificate or certificate # _____
or proof of submitting application*

☐ No *provide information about applying for certification and explain that they can apply before
having staff trained to be Certified Renovators*

Does the firm have Certified Renovators on staff?

☐ Yes *obtain copies of certificates or a list of names with name of training provider and training date*

☐ No *what steps have they taken to get trained?
Provide information about training classes if needed..*



Phase 2 Notes

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

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Inspection Checklist

Phase 2 – Records Review

If the firm/person being inspected asserts they are in compliance, proceed to Phase 2. Explain that you are required to view records to verify the information provided in Phase One of the inspection. Start by asking for records from the last 6 months. Select an appropriate project to review in detail. Get copies or take photos of sufficient documentation to be able to verify compliance with RRP. Use enforcement discretion to decide how many records to look at or copy. This is covered by the regulation:

“Firms performing renovations must retain and, if requested, make available to EPA, all records necessary to demonstrate compliance...for a period of three years following completion of the renovation” (40 C.F.R. §745.86(a)). “Records that must be retained... shall include (where applicable):” 40 C.F.R. §745.86(b))

1. Records or reports certifying that a determination had been made that lead-based paint **was not present** on the components affected by the renovation. Acceptable documentation may be **either**:

Reports prepared by a certified inspector or certified risk assessor (certified pursuant to either Federal regulations at §745.226 or an EPA-authorized State or Tribal certification program), or

Records prepared by a certified renovator after using EPA-recognized test kits, including an identification of the manufacturer and model of any test kits used, a description of the components that were tested including their locations, and the result of each test kit used.(see item 4c below)

2. Signed and dated acknowledgments of receipt of **RR pamphlet** by owner/adult unit occupant/adult rep. of Child-Occupied Facility **no more than 60 days before** renovation starts:

Or, Certifications of attempted delivery (form signed by Cert.Renovator)

Or, Certificates of mailing (7 days prior to renovation) to owner or adult unit occupant

3. Regarding **common area** renovations, records of notification activities must be kept. (Form in *Small Entity Compliance Guide*)

4. Documentation of compliance with the requirements of RRP **Work Practice Standards** including certification by the Certified Renovator that:

- a) Training was provided to workers (topics must be identified for each worker).
- b) Warning signs were posted at the entrances to the work area.
- c) If test kits were used, that the specified brand of kits was used at the specified locations and that the results were as specified.
- d) The work area was contained by:
 - (A) Removing or covering all objects in the work area (interiors).
 - (B) Closing and covering all HVAC ducts in the work area (interiors).
 - (C) Closing all windows in the work area (interiors) or closing all windows in and within 20 feet of the work area (exteriors).
 - (D) Closing and sealing all doors in the work area (interiors) or closing and sealing all doors in and within 20 feet of the work area (exteriors).
 - (E) Covering doors in the work area that were being used to allow passage but prevent spread of dust.
 - (F) Covering the floor surface, including installed carpet, with taped-down plastic sheeting or other impermeable material in the work area 6 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to contain the dust, whichever is greater (interiors), **AND/OR:**
Covering the ground with plastic sheeting or other disposable impermeable material anchored to the building extending 10 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to collect falling paint debris, whichever is greater, unless the property line prevents 10 feet of such ground covering, weighted down by heavy objects (exteriors).

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Inspection Checklist**

- (G) Installing (if necessary) vertical containment to prevent migration of dust and debris to adjacent property (exteriors).
- (H) Waste was contained on-site and while being transported off-site.
- (I) The work area was properly cleaned after the renovation by:
 - i) Picking up all chips and debris, misting protective sheeting, folding it dirty side inward and taping it for removal.
 - ii) Cleaning the work area surfaces and objects using a HEPA vacuum and/or wet cloths or mops (interiors).
- (J) The certified renovator performed the post-renovation cleaning verification (the results of which must be briefly described, including the number of wet and dry cloths used) or a copy of the dust sampling report.

RRP also requires that the Renovation Recordkeeping Checklist or a comparable sheet be delivered to owner/rental occupant/adult representative of C.O.F.: "When the final invoice for the renovation is delivered or within 30 days of the completion of the renovation, whichever is earlier, the renovation firm must provide information pertaining to compliance with this subpart" . . . (40 C.F.R. §745.86(c)). [Subpart E = RRP]

Written acknowledgement is not required, but try to determine the date that required compliance information was given to owner / occupant /adult representative:

Given to: _____ on date: _____

Phase 2 Notes:

Aware of this requirement? _____

Unaware of this requirement? _____

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Inspection Checklist

Phase 3 – Onsite Inspection

Review as many of the circumstances as possible. Take photographs or get copies of any documentation available. Advise we may follow-up with Phase 2 inspection or Information Request Letter

All Projects

Does the Certified Renovator(s) have course completion certificate or renewal available (may be electronic)?

☐ Yes ☐ No

Are Warning Signs Posted? (Defining the work area and warning unauthorized persons to stay out. In language of the occupants?)

☐ Yes ☐ No

Is the work area contained so that no dust or debris can leave the work area during the renovation?

☐ Yes ☐ No

Are prohibited practices being used?

☐ Yes ☐ No

Is waste being properly controlled?

☐ Yes ☐ No

Interior Projects

Are all objects removed from the work area or covered with plastic, with seams & edges sealed?

☐ Yes ☐ No

Are all ducts in work area covered with taped-down plastic?

☐ Yes ☐ No

Are windows and doors in work area closed and the doors covered with plastic?

☐ Yes ☐ No

Is the floor in the work area covered with taped-down plastic at least 6 feet beyond the perimeter of surfaces being impacted or far enough to contain dust if greater?

☐ Yes ☐ No

Are decon procedures in use to ensure that all personnel, tools, PPE, and waste containers are free of dust and debris when leaving the work area?

☐ Yes ☐ No

Has proper cleaning been performed at the end of the renovation so that no dust, debris, or residue remains?

- All paint chips and debris collected and sealed in heavy-duty bag?
- Protective sheeting removed and disposed of as waste – not re-used?
- Walls cleaned from ceiling to floor and 2 feet beyond work area by HEPA vacuum or damp wipe?
- All remaining surfaces and objects, including furniture & fixtures HEPA-vacuumed?
- All remaining hard surfaces damp-wiped and floors mopped with 2-bucket process or wet mopping system

☐ Yes ☐ No

Has cleaning verification (Certified Renovator) or dust sampling (Risk Assessor, LBP Inspector, or Dust Sampling Tech) been performed? (obtain samples of documentation)

☐ Yes ☐ No

Phase 3 – Onsite Inspection

Are all doors and windows within 20 feet of the renovation closed?

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

- All paint chips and debris collected and sealed in heavy-duty bag?
- Protective sheeting removed and disposed of as waste – not re-used?
- All waste contained to prevent release of dust and debris during transport offsite?

☐ Yes ☐ No☐ Yes ☐ No

Phase 3 Notes